

EXHIBIT 183

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION
THE STATE OF TEXAS, et al. PLAINTIFFS
VS. CIVIL ACTION NO. 4:20-CV-957-SDJ
GOOGLE LLC DEFENDANT

30(b)(6) DEPOSITION OF STATE OF MISSISSIPPI

BY ITS REPRESENTATIVE

CRYSTAL UTLEY SECOY

Taken at the
Office of the Mississippi Attorney General,
550 High Street,
Jackson, Mississippi,
on Thursday, April 25, 2024,
beginning at approximately 12:56 p.m.

CATHY M. WHITE, CCR
Certified Court Reporter #1309
Notary Public

1 form of digital advertising that they use; right?

2 A. Correct.

3 Q. Okay. So you don't know, for example,
4 whether any state agency uses Google advertising --
5 display advertising technology?

6 A. I do not.

7 Q. And you referenced some consumer complaints
8 here. Just to confirm then, so none of the -- first,
9 Mississippi produced all of the consumer complaints
10 that it could locate in response to Google's request
11 for production in this case; right?

12 A. Correct.

13 Q. And you agree that none of those relate to
14 Google's display advertising technology; right?

15 A. Yes.

16 Q. And Mississippi didn't rely on any of those
17 consumer complaints in forming the allegations in the
18 complaint in this case; right?

19 A. Correct.

20 Q. And Mississippi is not going to rely on any
21 of those consumer complaints at trial; right?

22 A. Correct.

23 Q. You're aware that certain third parties were
24 interviewed as part of an investigation leading up to
25 the filing of this case; right?

1 telling you that --

2 MS. SCHULTZ: I wouldn't -- only answer --

3 THE WITNESS: Okay.

4 MS. SCHULTZ: -- questions asked. To the
5 extent you can do so without violating work product
6 here, you may do so.

7 A. So, no.

8 BY MR. AYCOCK:

9 Q. Okay. So before suit was filed then,
10 Mississippi determined that in-state advertisers and
11 publishers had been harmed by Google's conduct?

12 MS. SCHULTZ: And I'm going to say that --
13 assert a work product privilege there.

14 If you may -- if you can answer without
15 disclosing work product, you may.

16 A. It's our position that advertisers and
17 publishers in Mississippi would have been impacted by
18 the conduct because it's our understanding that this
19 is a national issue and that it impacts our entire
20 state, consumers, advertisers, publishers, businesses.

21 BY MR. AYCOCK:

22 Q. Okay. So but you didn't make any specific
23 findings about harm in particular to anybody in
24 Mississippi before suit was filed; right?

25 MS. SCHULTZ: Same objection there to work

1 product.

2 You can only answer to the extent it does not
3 disclose work product.

4 A. We did not interview -- we have not
5 interviewed any advertisers or publishers, so I'm
6 not -- I cannot identify one specific advertiser or
7 publisher today.

8 BY MR. AYCOCK:

9 Q. Okay. So today, you can't name any
10 particular advertiser or publisher in Mississippi who
11 has been harmed by Google's alleged conduct?

12 A. Not by a specific name, because it's our
13 position that it's pretty much every business in the
14 State of Mississippi. And we're also -- I mean, it's
15 my understanding that we're still in the middle of
16 discovery, and that that will play out through
17 discovery and potentially with our experts.

18 Q. You haven't made any state-specific
19 conclusions about the extent of the harm to parties in
20 Mississippi; right?

21 A. We have answered some questions regarding
22 that on interrogatory number 26. I think, beyond
23 that, we -- that's as far as civil penalties. Harm
24 would be in interrogatory number 5.

25 MR. AYCOCK: Go ahead and mark those as the

CERTIFICATE OF COURT REPORTER

I, Catherine M. White, CSR, and Notary Public in and for the County of Rankin, State of Mississippi, hereby certify that the foregoing pages, and including this page, contain a true and correct transcript of the testimony of the witness, as taken by me at the time and place heretofore stated, and later reduced to typewritten form by computer-aided transcription under my supervision and to the best of my skill and ability.

I further certify that I placed the witness under oath to truthfully answer the questions in this matter under the power vested in me by the State of Mississippi. I further certify that I am not in the employ of or related to any counsel or party in this matter, and have no interest, monetary or otherwise, in the final outcome of the proceedings.

Witness my signature and seal this the 26th day of April, 2024.



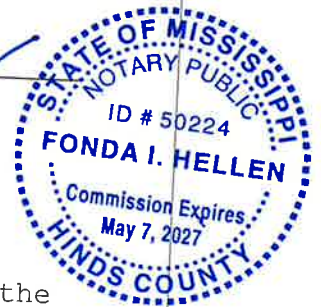
CATHERINE M. WHITE, CSR No. 1309

My Commission Expires:
February 1, 2026

DEPONENT'S CERTIFICATE

I, Crystal Utley Secoy, the deponent in the foregoing deposition, certify that I have read the foregoing pages 4 - 62, being the total number of pages relating to my testimony, as to the correctness thereof, and that after reading said pages and subject to any corrections I may have reflected below, I certify that this testimony is true, correct and complete and that the transcript thereof is true and correct.

Crystal Utley Secoy
Crystal Utley Secoy



STATE OF MS
COUNTY OF Hinds

20th day of May, 2024.
SWORN TO AND SUBSCRIBED before me on this the

Fondra I. Hellen
NOTARY PUBLIC

My Commission expires: _____

PAGE | LINE | CORRECTION | REASON

43 | 3 | delete "like," | did not say

53 | 7 | delete "you know," | did not say

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